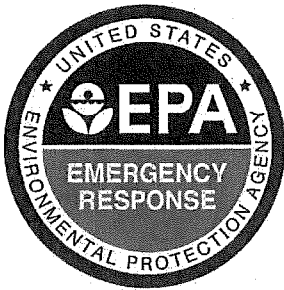


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UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION V  
RESPONSE SECTION 1  
25089 CENTER RIDGE ROAD  
WESTLAKE, OHIO 44145

July 25, 2014

Richland Moulded Brick Company, Inc.

c/o: Jack A. Van Kley  
Van Kley and Walker, LLC  
132 Northwoods Boulevard  
Suite C-1  
Columbus, Ohio 43235

RE: Notification of Completion - Administrative Order by Consent,  
Docket No. V-W-13-C-019, for the Richland Moulded Brick Site, Richland  
County, Ohio (Site ID #C5E5).

Dear Mr. Van Kley:

The U.S. Environmental Protection Agency (EPA) has completed its review of the "Final Removal Action Completion Report", that was submitted by Chem Tech Consultants, Inc., on behalf of your client, Richland Moulded Brick Company, Inc. Anniston, Alabama. By this letter, EPA gives acknowledgement of completion of the requirements of the Administrative Order by Consent (AOC) listed below.

EPA issued the AOC on September 25, 2013. The AOC was issued to conduct a time critical removal action at the Richland Moulded Brick site (Site), 800-1000 Richland Shale Road, Mansfield, Richland County, Ohio, which EPA determined presented an imminent and substantial endangerment to public health and the environment.

Specific factors considered in the determination were the presence of abandoned drums and containers (some of which contained characteristic hazardous waste) at the Site. Improper storage of the wastes has been documented by the Ohio Environmental Protection agency. The hazardous substances posed potential threats through the following routes as outlined in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) 40 Code of Federal Regulations (CFR) 300.415(b)(2):

- (1) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants, or contaminants;
- (2) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that pose a threat of release;
- (3) High levels of hazardous substances in soils largely at or near the surface, that may migrate;
- (4) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;
- (5) Threat of fire or explosion; and
- (6) The unavailability of other appropriate Federal or State response mechanisms to respond to the release.

On September 14, 2013, Respondent signed the AOC indicating their intent to comply with the AOC and perform the Removal Action. Pursuant to the AOC, the Respondent submitted: (1) a document titled "Health and Safety Plan" Richland Moulded Brick Site prepared by Chem-Tech Consultants, Inc. (Chem-Tech), on October 7, 2013, and (2) a document titled "Site Security and Work Plan" prepared by Chem-Tech and submitted to EPA on October 9, 2013. On October 10, 2013, EPA gave Chem-Tech permission to start work. Notifications and progress reports were received by EPA in a timely fashion and as required in the AOC.

On July 11, 2014, the Respondent submitted, as required by the AOC, a Final Report on its activities at the Site. Based on my oversight of the Respondent's activities at the Site, an inspection of the Site conducted on June 9, 2014, and my review of the Final Report, I have concluded that the Respondent has completed the following work required by the AOC:

- a. Development and implementation of a Site Health and Safety Plan, and a Site Security Plan;
- b. Characterize and dispose of all hazardous substances, materials, pollutants or contaminants located at the Site, including but not limited to material contained in drums, tanks or other storage containers, but not including bricks and asbestos attached to or contained in kilns, heating equipment, and intact building materials;
- c. Remove oil from open pits;

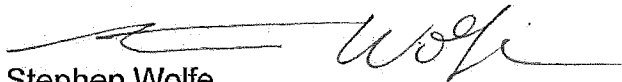
- d. Decontaminated heavy equipment used for Site removal activities as necessary and appropriately disposed of decontamination water;
- e. Take any necessary response action to address any release or threatened release of a hazardous substance, pollutant, or contaminant that U.S. EPA determines may pose an imminent and substantial endangerment to the public health or the environment;
- f. Eliminate all threats presented by hazardous substances and/or pollutants or contaminants in the building consistent with the provisions of Section 300.415(1) of the NCP; and
- g. Treat, store or dispose of all hazardous substances, pollutants or contaminants removed off-Site pursuant to this removal action at a facility in compliance, as determined by U.S. EPA, with EPA Off-Site Rule, 40 CFR 300.440.

This letter merely reflects EPA's determination that the above-mentioned work performed by Respondent as required by the AOC was completed. This notice in no way releases the Respondent from any potential future obligations to perform additional work to address the same, or other, conditions at the Site.

This notice does not release the Respondent from any record keeping, payment, or other obligations under the AOC that extend beyond the date of this notice.

Please contact me at (440) 250-1718 if you have any questions concerning this letter.

Sincerely,



Stephen Wolfe  
OSC, ERB-1, ERS-1

cc: Stephen Wolfe, OSC, ERS-1  
Matt Mankowski, Section Chief, ERB-1, ERS-1  
Robert Peachey, ORC  
Thomas Turner, ORC  
Carol Ropski, ESS